

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 RANDY HAYS,)
)
 Defendant.)

No. 4:18 CR 000975 RWS/JMB

**GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION FOR LEAVE TO
TRAVEL**

COMES NOW the United States of America, by and through Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jennifer A. Winfield, Assistant United States Attorney for said District, and, for its response to defendant Randy Hays' Motion for Leave to Travel, states as follows:

1. On April 5, 2019, defendant Hays filed a motion for leave to travel to Camdenton, Missouri. The Government opposes the motion because it lacks sufficient specificity to reasonably allay the Government's concerns as to defendant's whereabouts and activities during the time period for which he seeks permission to travel.

2. While the motion specifies a beginning and ending period during which defendant seeks to travel "from time to time," the motion lacks other specifics such as names, addresses, and phone numbers of persons defendant intends to visit, specific dates of travel, specific location of visits, and specific reasons for the visits.

3. Should defendant be allowed to travel based on the scant information in the current motion, the Government believes that the Pretrial Services Office's ability to adequately

supervise defendant will be unduly hampered. At a minimum, defendant should be required to provide more specifics as to his intended travel.

4. Accordingly, the Government believes that defendant's motion should be denied.

WHEREFORE, the United States respectfully requests this honorable Court to deny defendant's motion for leave to travel.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

s/ Jennifer A. Winfield
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CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2019, the attached was filed electronically with the Clerk of the Court and served by way of this Court's Electronic Notification System upon all counsel of record.

s/ Jennifer A. Winfield
JENNIFER A. WINFIELD, 53350MO
Assistant United States Attorney